

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MST, LLC,)	Civil Action No. 2:22-cv-874-DCN
)	
Plaintiff,)	
)	
vs.)	<u>DEFENDANT GEORGETOWN</u>
)	<u>MEMORIAL HOSPITAL</u>
North American Land Trust and Georgetown)	<u>ANSWERS TO LOCAL CIVIL</u>
Memorial Hospital,)	<u>RULE 26.01 INTERROGATORIES</u>
)	
Defendants.)	
)	
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Georgetown Memorial Hospital,)	
)	
Counterclaim-Plaintiff,)	
)	
vs.)	
)	
MST, LLC,)	
)	
Counterclaim-Defendant.)	
)	
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Georgetown Memorial Hospital,)	
)	
Third-Party Plaintiff,)	
)	
vs.)	
)	
James Murren, and Heather Murren,)	
)	
Third-Party Defendants.)	
)	
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Defendant, Georgetown Memorial Hospital (“GMH”), answers Local Civil Rule
26.01 Interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: GMH is not currently aware of any individual or entity that has a subrogation interest in any of the claims asserted in the above-captioned lawsuit.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: GMH's legal claims should be tried by a jury.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: GMH is not a publicly owned company; is not a parent, subsidiary, partner, or affiliate of any publicly owned company, and does not own ten percent or more of any publicly owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: The real property at issue in this lawsuit is located in Georgetown County, South Carolina and the acts giving rise to GMH's tort claims against the Counterclaim-Defendant and Third-Party Defendants took place in Georgetown County, South Carolina. Georgetown County is within the geographic boundaries of this division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases

are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This action is related in part to the lawsuit captioned NAACP et al. v. Georgetown County et al., 2:22-cv-04077-BHH in that there are common facts giving rise to each lawsuit. NAACP et al. v. Georgetown County et al. was filed on November 16, 2022. No responsive pleadings have been filed yet.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: GMH is properly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: GMH is not presently aware of other persons or legal entities who may be liable in this matter but reserves all rights to identify such persons or entities at a later time and pursue claims against them should they become known to GMH.

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Myrtle Beach, South Carolina
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